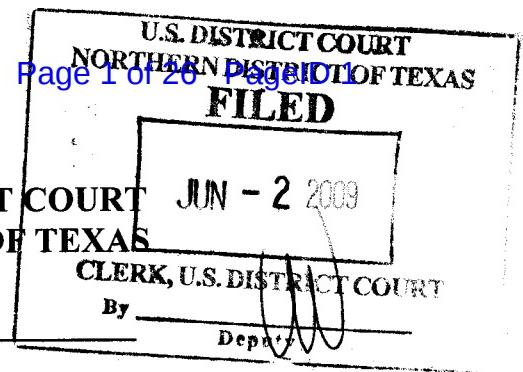


**ORIGINAL**

-00145-N Document 1 Filed 06/02/14

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**



3-09 CR 145-N

No.

**TO BE FILED UNDER SEAL**

## INDICTMENT

## The Grand Jury Charges:

## Introduction

At all times material to this indictment:

1. The escort referral service PrivateBash.com and the associated web-site were, at all times referred to in this indictment, solely owned by defendant, **Marcus Choice Williams** (“Williams”).
  2. PrivateBash.com, at all times referred to in this indictment, advertised itself as “an elite full dating service” providing “exclusive and discreet service” for those “looking for the finest in female companionship.”

3. PrivateBash.com, at all times referred to in this indictment, advertised "Incall" and "Outcall" services for locations in "Boston-D.C.-Dallas."

4. At all times referred to in this indictment, Darkside Productions, Inc. has operated the website located at [www.erosguide.com](http://www.erosguide.com) and featured advertising for the adult entertainment and sex industry worldwide.

5. The following pseudonyms: a) T. A., b) K. M., c) C. C., and d) J. L.; were given by defendant **Marcus Choice Williams** to young women who are also known to the Grand Jury by their legal names and the following dates of birth, respectively: a) April 4, 1981, b) September 14, 1977, c) November 10, 1981, and d) May 13, 1986.

Count One  
Conspiracy to Transport for Prostitution  
(Violation of 18 U.S.C. § 371 (18 U.S.C. § 2421))

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.

2. Beginning on or about April 5, 2006, and continuing through on or about August 15, 2007, all dates being approximate and inclusive, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Marcus Choice Williams**, **Kenya Leeann Thomas** and **Preston Petitt**, did knowingly and willfully conspire and agree with each other and with others known and unknown to the Grand Jury to commit offenses against the United States, to wit, knowingly transporting individuals in interstate or foreign commerce, with the intent that such individuals engage in prostitution in violation of 18 U.S.C. § 2421.

Object of the Conspiracy

3. It was the object of the conspiracy to transport young women between various cities, including but not limited to Dallas, Texas, Washington, D.C. and Boston, Massachusetts to engage in prostitution for the financial benefit of defendant **Marcus Choice Williams**.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendants **Williams**, **Thomas**, **Petitt** and other coconspirators both known and unknown to the Grand Jury managed a prostitution

ring that operated in several states and jurisdictions, including, but not limited to, Texas, Massachusetts, and Washington, D.C.

5. It was further part of the conspiracy that defendants **Williams, Thomas, Petitt** and other coconspirators both known and unknown to the Grand Jury recruited and transported young women between several states and Washington, D.C. for the purpose of engaging in prostitution.

6. It was further part of the conspiracy that defendants **Williams, Thomas, Petitt** and other coconspirators both known and unknown to the Grand Jury rented hotel rooms from which young women engaged in acts of prostitution.

7. As the result of actions taken in furtherance of the conspiracy, defendant **Williams** derived substantial income from the prostitution of young women.

#### Overt Acts

8. In furtherance of the conspiracy and to accomplish its objective, the conspirators committed the following overt acts, among others, in the Northern District of Texas and elsewhere:

- a) On or about April 5, 2006, defendant **Williams** leased Apartment #534, located within The Montgomery Apartments, 11101 Georgia Avenue, Wheaton, Maryland.

- b) On or about May 12, 2006, through on or about May 18, 2006, defendant **Williams** rented a room at the Hilton Washington, D.C./Silver Spring Hotel.
- c) On or about June 9, 2006, defendant **Williams** contracted with 3rdigital Web Design d/b/a NewDesignStudio.com to develop and host the web-site, PrivateBash.com, and to photograph several young women in various stages of undress for advertisement on that web-site.
- d) On various dates between on or about June 9, 2006, and August 10, 2007, defendant **Williams** paid NewDesignStudio.com to photograph young women for advertisement on the website www.PrivateBash.com.
- e) On or about August 8, 2006, through on or about August 10, 2006, defendant **Williams** rented a room at the Jury's Boston Hotel, in Boston, Massachusetts.
- f) On or about September 6, 2006, defendant **Williams** established a bank account in the name of Redd2Salon, and made the following deposits into said bank account:
  - i) September 7, 2006 - \$3,800; ii) September 11, 2006 - \$4,500; iii) September 19, 2006 - \$4,750; and iv) October 4, 2006 - \$2850.

- g) On or about October 4, 2006, through on or about October 7, 2006, defendant **Williams** rented a room at the Jury's Boston Hotel, in Boston, Massachusetts.
- h) On or about December 7, 2006, and on or about December 18, 2006, defendant **Thomas** rented a room at the Dupont Hotel in Washington, D.C.
- i) On or about December 8, 2006, through December 10, 2006, defendant **Thomas** rented a room at the Jury's Washington Hotel in Washington, D.C.
- j) On or about December 12, 2006, through on or about December 15, 2006, and on or about July 9, 2007, through on or about July 18, 2007, defendant **Thomas** rented a room at the Washington, D.C. Courtyard Marriott Hotel.
- k) On or about March 26, 2007, defendant **Thomas** rented a room at the St. Gregory Hotel in Washington, D.C.
- l) On or about May 30, 2007, defendant **Petitt** assisted, aided and abetted defendant **Williams** in verbally and physically assaulting E.H.
- m) On or about June 26, 2007, defendant **Williams** sent \$391.00 via wire transfer to Darkside Productions.
- n) On or about July 23, 2007, at approximately 2:05 a.m., defendant **Thomas** posted a \$100 bond to secure the release of K.D. a/k/a J.L. who had been arrested by the District of Columbia Metropolitan Police Department.

- o) On or about August 15, 2007, in the presence of defendant **Petitt**, defendant **Williams** verbally, physically and sexually assaulted K.D. a/k/a J.L.
- p) On or about August 15, 2007, defendants **Thomas** and **Petitt**, removed computers and various storage media from 3046 Morning Star Drive, Little Elm, Texas.

All in violation of 18 U.S.C. §§ 371 (18 U.S.C. § 2421) and 2.

Count Two  
Transportation for Prostitution  
(Violation of 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about June 16, 2006, in the Northern District of Texas and elsewhere, defendant **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another did knowingly transport C.L. a/k/a T.A. in interstate commerce from Dallas, Texas to Wheaton, Maryland and Washington, D.C., with intent that C.L. a/k/a T.A. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation 18 U.S.C. §§ 2421 and 2.

Count Three  
Transportation for Prostitution  
(Violation of 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about August 14, 2006, in the Northern District of Texas and elsewhere, defendant **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly transport R.F. a/k/a K.M. in interstate commerce from Dallas, Texas to Boston, Massachusetts, with intent that R.F. a/k/a K.M. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. §§ 2421 and 2.

Count Four  
Transportation for Prostitution  
(Violation 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about September 7, 2006, in the Northern District of Texas and elsewhere, **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly transport C.L. a/k/a T.A. in interstate commerce from Dallas, Texas to Baltimore, Maryland and Washington, D.C., with intent that C.L. a/k/a T.A. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation 18 U.S.C. §§ 2421 and 2.

Count Five  
Transportation for Prostitution  
(Violation 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about September 15, 2006, in the Northern District of Texas and elsewhere, **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly transport C.L. a/k/a T.A. in interstate commerce from Dallas, Texas to Baltimore, Maryland and Washington, D.C., with intent that C.L. a/k/a T.A. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. §§ 2421 and 2.

Count Six  
Transportation for Prostitution  
(Violation 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about September 20, 2006, in the Northern District of Texas and elsewhere, **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly transport R.R. a/k/a C.C. in interstate commerce from Dallas, Texas to Baltimore, Maryland and Washington, D.C., with intent that R.R. a/k/a C.C. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. §§ 2421 and 2.

Count Seven  
Transportation for Prostitution  
(Violation 18 U.S.C. §§ 2421 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about July 2, 2007, in the Eastern District of Texas and elsewhere, defendant **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly transport K.D. a/k/a J.L. in interstate commerce from Little Elm, Texas to Washington, D.C., with intent that K.D. a/k/a J.L. engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. §§ 2421 and 2.

Count Eight  
Sex Trafficking by Force  
(Violations 18 U.S.C. §§ 1591 and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. On or about June 2, 2007, through on or about August 15, 2007, in the Northern District of Texas and elsewhere, defendant **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, and obtain by any means, K.D. a/k/a J.L., an individual, knowing that force, fraud, and coercion would be used to cause K.D. a/k/a J.L. to engage in commercial sex acts.

In violation of 18 U.S.C. §§ 1591 and 2.

Count Nine  
Attempted Sex Trafficking by Force  
(Violations of 18 U.S.C. §§ 1594 (18 U.S.C. § 1591) and 2 )

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. From on or about August 14, 2006, and continuing through on or about February 6, 2007, in the Northern District of Texas and elsewhere, defendant **Marcus Choice Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly in and affecting interstate commerce, attempt to recruit and obtain by any means, R.F. a/k/a K.M. knowing that force, fraud and coercion would be used to cause R.F. a/k/a K.M. to engage in commercial sex acts.

In violation of 18 U.S.C. § 1594 (18 U.S.C. § 1591) and 2.

Count Ten  
Attempted Sex Trafficking by Force  
(Violations of 18 U.S.C. §§ 1594 (18 U.S.C. § 1591) and 2 )

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. From on or about May 1, 2007, through on or about June 10, 2007, in the Eastern District of Texas and elsewhere, defendant **Williams**, together with others known and unknown to the Grand Jury, and while aiding and abetting one another, did knowingly in and affecting interstate commerce attempt to recruit and obtain by any means E.H. (D.O.B.: December 24, 1982), knowing that force, fraud and coercion would be used to cause E.H. to engage in commercial sex acts.

In violation of 18 U.S.C. § 1594 (18 U.S.C. § 1591) and 2.

Count Eleven  
Laundering of Monetary Instruments  
(Violations of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2)

1. The Grand Jury realleges and incorporates the Introduction of this Indictment as fully set forth herein.
2. From in or about September 6, 2006, to in or about December 1, 2006, in the Northern District of Texas and elsewhere, the defendant, **Marcus Choice Williams**, and others known and unknown to the Grand Jury, aiding and abetting one another, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, to wit, the violation of 18 U.S.C. § 2421 (transportation for prostitution) as charged in Counts Four, Five and Six above, conducted financial transactions affecting interstate commerce which involved the proceeds of such specified unlawful activity with the intent to promote the carrying on of such specified unlawful activity, to wit, defendant **Williams** caused multiple deposits to be made into J.P. Morgan Chase Account #000000711481598 and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 2.

**ADDITIONAL ALLEGATIONS AS TO COUNT EIGHT**

1. The allegations set forth in Count 8 are hereby realleged and incorporated as if fully set forth in this paragraph, and the additional allegations below are incorporated by reference into Count 8.
2. The offense involved criminal sexual abuse, attempted criminal sexual abuse, and assault to commit criminal sexual abuse and was committed knowingly by force and threat of force (U.S.S.G. §§ 2G1.1(c)(2); 2A3.1(b)(1)).

Count Twelve

Forfeiture Allegation

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 2428(a); 18 U.S.C. § 1594(d); 18 U.S.C. § 982(a)(1)]

Upon conviction for the offense alleged in Count One of this Indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), defendant **Marcus Choice Williams** shall forfeit to the United States all property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

Upon conviction for any of the offenses alleged in Counts Two through Seven and Counts Eight through Ten of this Indictment and pursuant to 18 U.S.C. § 2428(a) and 18 U.S.C. § 1594(d), respectively, defendant **Marcus Choice Williams** shall forfeit to the United States his interest in all property, real or personal, used or intended to be used to commit or facilitate the commission of the respective offense; and all property, real or personal, constituting or derived from any proceeds that he obtained, directly or indirectly, as a result of the respective offense.

Upon conviction for the offense alleged in Count Eleven of this Indictment and pursuant to 18 U.S.C. § 982(a)(1), defendant **Marcus Choice Williams** shall forfeit to the United States all property, real or personal, involved in the offense or traceable to property involved in the offense.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

LORETTA KING  
ACTING ASSISTANT ATTORNEY GENERAL FOR CIVIL RIGHTS

\_\_\_\_\_  
MYESHA BRADEN  
U.S. Department of Justice  
Civil Rights Division - Criminal Section  
District of Columbia Bar No. 461485  
601 D Street, NW - Fifth Floor  
Washington, DC 20530  
Telephone: 202.305.1483  
Facsimile: 202.514-8336  
Email: Myesha.Braden@usdoj.gov

JAMES T. JACKS  
ACTING UNITED STATES ATTORNEY

\_\_\_\_\_  
ERRIN MARTIN  
Assistant United States Attorney  
Texas State Bar No. 24032572  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Telephone: 214.659.8600  
Facsimile: 214.767.2916  
Email: Errin.Martin@usdoj.gov

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
**FILED**

JUN - 2 2009

CLERK, U.S. DISTRICT COURT  
By \_\_\_\_\_  
Deputy

THE UNITED STATES OF AMERICA

VS. **3 - 09 CR 145 - N**

MARCUS CHOICE WILLIAMS (1)  
KENYA LEEANN THOMAS (2)  
PRESTON PETITT (3)

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SEALED INDICTMENT

18 U.S.C. § 371 (18 U.S.C. § 2421)  
Conspiracy to Transport for Prostitution

18 U.S.C. §§ 2421 and 2  
Transportation for Prostitution

18 U.S.C. §§ 1591 and 2  
Sex Trafficking by Force

18 U.S.C. §§ 1594 (18 U.S.C. § 1591) and 2  
Attempted Sex Trafficking by Force

18 U.S.C. §§ 1956(a)(1)(A)(I) and 2  
Laundering of Monetary Instruments

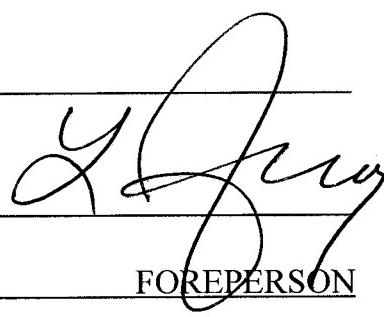
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 2428(a); 18 U.S.C. § 1594(d); 18 U.S.C. § 982(a)(1)  
Forfeiture Allegation

12 Counts

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A true bill,

DALLAS

  
FOREPERSON

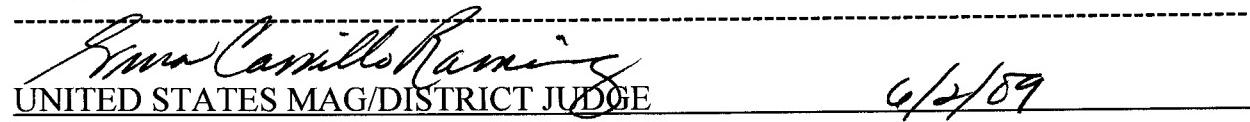
Filed in open court this \_\_\_\_\_ day of \_\_\_\_\_, A.D. 2009.

Clerk

ISSUE WARRANT FOR ARREST for:

Marcus Choice Williams and

Kenya Leeann Thomas

  
UNITED STATES MAG/DISTRICT JUDGE

6/2/09

No Criminal Case Pending

\*\*\*THIS MATTER IS TO BE SEALED\*\*\*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**
**Defendant Information**
Juvenile:  Yes  No

If Yes, Matter to be sealed:

 Yes  No
**Related Case Information**
Superseding Indictment:  Yes  No New Defendant:  Yes  NoPending CR Case in NDTX:  Yes  No If Yes, number: \_\_\_\_\_

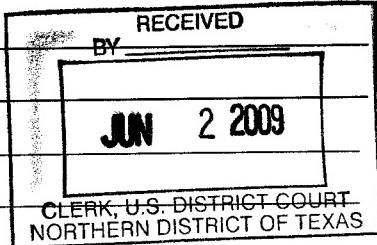
Search Warrant Case Number \_\_\_\_\_

R 20 from District of \_\_\_\_\_

Magistrate Case Number \_\_\_\_\_

Defendant Name MARCUS CHOICE WILLIAMSAlias Name a.k.a. "CrossCountry Redd" a.k.a "Redd"

Address \_\_\_\_\_

County in which offense was committed: DALLAS
**U.S. Attorney Information**
Errin Martin Bar # TX Bar No. 24032572
**Interpreter**
 Yes  No If Yes, list language and/or dialect: \_\_\_\_\_
**Location Status**

Arrest Date \_\_\_\_\_

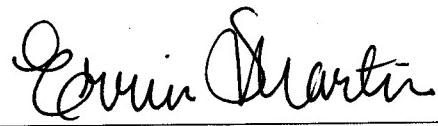
 Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_ Already in State Custody On Pretrial Release**\*Please issue an Arrest Warrant\***
**U.S.C. Citations**
Total # of Counts as to This Defendant: 12 Petty       Misdemeanor       Felony
**Citation**
**Description of Offense Charged**
**Count(s)**

<u>18 USC § 371 (18 USC 2421)</u>	Conspiracy to Transport for Prostitution	1
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	2
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	3
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	4
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	5
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	6
<u>18 USC §§ 2421 and 2</u>	Transportation for Prostitution	7

<u>18 USC §§ 1591 and 2</u>	Sex Trafficking by Force	8
<u>18 USC §§ 1594 (18 USC § 1591) and 2</u>	Attempted Sex Trafficking by Force	9
<u>18 USC §§ 1594 (18 USC § 1591) and 2</u>	Attempted Sex Trafficking by Force	10
<u>18 USC §§ 1956(a)(1)(A)(I) and 2</u>	Laundering of Monetary Instruments	11
<u>28 U.S.C. § 2461(c); 18 U.S.C. § 2428(a); 18 U.S.C. § 1594(d);</u>	Forfeiture Allegation	12
<u>18 U.S.C. § 982(a)(1)</u>		

Date June 2, 2009

Signature of AUSA:



Name of AUSA

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**SEALED****Related Case Information****1. Defendant Information**Juvenile:  Yes  No

If Yes, Matter to be sealed:

 Yes  NoSuperseding Indictment:  Yes  No New Defendant:  Yes  NoPending CR Case in NDTX:  Yes  No If Yes, number: \_\_\_\_\_

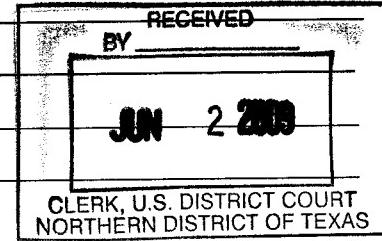
Search Warrant Case Number \_\_\_\_\_

R 20 from District of \_\_\_\_\_

Magistrate Case Number \_\_\_\_\_

Defendant Name KENYA LEEANN THOMASAlias Name a.k.a. "Arielle Scott"

Address \_\_\_\_\_

County in which offense was committed: DALLAS**2. U.S. Attorney Information**Errin Martin Bar # TX Bar No. 24032572**3. Interpreter** Yes  No If Yes, list language and/or dialect: \_\_\_\_\_**4. Location Status**

Arrest Date \_\_\_\_\_

- Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**\*Please issue an Arrest Warrant\*****5. U.S.C. Citations**Total # of Counts as to This Defendant: 1  Petty  Misdemeanor  Felony**Citation****Description of Offense Charged****Count(s)**18 USC § 371 (18 USC § 2421)

Conspiracy to Transport for Prostitution

1

Date

June 2, 2009

Signature of AUSA:

Errin Martin

Name of AUSA

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**ORIGINAL**  
**Defendant Information**

Juvenile:  Yes  No

If Yes, Matter to be sealed:

Yes  No

**SEALED**

Related Case Information

Superseding Indictment:  Yes  No New Defendant:  Yes  No

Pending CR Case in NDTX:  Yes  No If Yes, number: \_\_\_\_\_

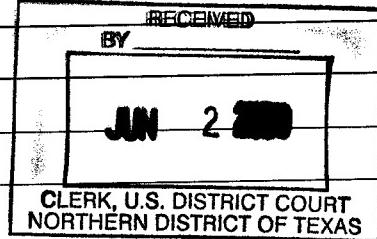
Search Warrant Case Number \_\_\_\_\_

R 20 from District of \_\_\_\_\_

Magistrate Case Number \_\_\_\_\_

Defendant Name

PRESTON PETITT



Alias Name

\_\_\_\_\_

Address

\_\_\_\_\_

County in which offense was committed: DALLAS

**2. U.S. Attorney Information**

Errin Martin

Bar # TX Bar No. 24032572

**3. Interpreter**

Yes  No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status**

Arrest Date \_\_\_\_\_

- Already in Federal Custody as of \_\_\_\_\_ in \_\_\_\_\_  
 Already in State Custody  
 On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 1  Petty  Misdemeanor  Felony

**Citation**

**Description of Offense Charged**

**Count(s)**

18 USC § 371 (18 USC § 2421)

Conspiracy to Transport for Prostitution

1

Date June 2, 2009

Signature of AUSA:

Errin Martin

Name of AUSA